

BEFORE THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

Docket No. 2018-319-E

In the Matter Of:

PETITION TO INTERVENE

Duke Energy Rate Increase

Hasala Dharmawardena petitions to intervene in this proceeding. In support of this petition, the following is provided.

1. The contact information of the petitioner is:

Name: Hasala Dharmawardena
Company: Public
Street Address: 145 Cochran Rd unit 4,
City, State, Zip: Clemson, SC, 29631
Email Address: hasala@ieee.org
Telephone: 864-207-0655

2. The Petitioner ☐ will ☒ will not be represented by counsel in this proceeding. The contact information for the petitioner's counsel to be included on the service list is:

Name:
Company:
Street Address:
City, State, Zip:
Email Address:
Telephone:

3. If the Petitioner is an organization, the number of members in and the purposes of the organization:

☐ List of Members attached

4. The nature and extent of the Petitioner's interest in this proceeding is:

~~As a low end user of electricity~~
 As a customer and also as an individual
 with good will towards the customer base of
 Duke in SC.

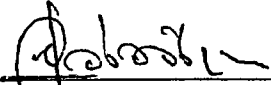
5. The issues the Petitioner intends to raise at the proceeding are:

1. ^{one time} Increase of 337% of fixed charge is too high, and ^(Basic Residential)
2. More responsibility is required from Duke as ^{under-} a company ^{-ses}; rather than passing through all the ^{lower} 'strategic investments' to the customers. ^{end}
3. Duke needs to present a long term and mid term ^{users} generation/Transmission plan, so that the decisions to start/stop building of power plants & TL (Transmission Lines) can be justified, HOLISTICALLY.

6. The special knowledge or expertise of the Petitioner that would assist the Commission in resolving the issues in this proceeding is:

I am a power Engineer with 12 years experience in the field in Sri Lanka, Norway & USA. Having an interest in energy policy, I have presented in been part of many public hearings on rate hikes. I have knowledge of energy planning, Socio-economic impact of electricity as well as power generation.

7. Based on the information provided above in accordance with the Commission's rules of procedure, I request to participate in this proceeding as an intervenor. I or the organization that I represent will not unreasonably broaden the issues, burden the record, or unreasonably delay the proceeding.


 Signature of Petitioner or Representative

1/10/2019
 Date

Duke, Daphne

From: Hasala Dharmawardena <hasala@ieee.org>
Sent: Thursday, January 10, 2019 10:38 AM
To: Kirby, Brad
Cc: Campbell, Chad; Johnson, Sarah; Dunbar, Skye; Waller, Takisha; Morgan, Willie
Subject: RE: Customer Comments - Duke Power Rate increase 2019
Attachments: Petition to intervene_Hasala.pdf

Dear Investigator,
 Please find attached the petition to intervene as per the instructions sent to me on 12/31.
 Best,
 Hasala Dharmawardena

From: Hasala Dharmawardena <hasala@ieee.org>
Sent: Monday, December 31, 2018 1:40 PM
To: 'Kirby, Brad' <bwkirby@regstaff.sc.gov>
Cc: 'Campbell, Chad' <ccampbe@regstaff.sc.gov>; 'Johnson, Sarah' <sjohnson@regstaff.sc.gov>; 'Dunbar, Skye' <sdunbar@regstaff.sc.gov>; 'Waller, Takisha' <twaller@regstaff.sc.gov>; 'Morgan, Willie' <wmorgan@regstaff.sc.gov>
Subject: RE: Customer Comments - Duke Power Rate increase 2019

Dear Sir,
 Yes, I would like to intervene as a customer. I will reach out to IEEE-USA leaders to see if IEEE could make a representation as well.
 Best,
 Hasala Dharmawardena

From: Kirby, Brad <bwkirby@regstaff.sc.gov>
Sent: Friday, December 28, 2018 3:51 PM
To: Hasala Dharmawardena <hasala@ieee.org>
Cc: Campbell, Chad <ccampbe@regstaff.sc.gov>; Johnson, Sarah <sjohnson@regstaff.sc.gov>; Dunbar, Skye <sdunbar@regstaff.sc.gov>; Waller, Takisha <twaller@regstaff.sc.gov>; Morgan, Willie <wmorgan@regstaff.sc.gov>
Subject: RE: Customer Comments - Duke Power Rate increase 2019

Dear Mr. Hasala Dharmawardena:

Thank you for your inquiry regarding the Duke Energy Carolina's request for rate increase. The Office of Regulatory Staff ('ORS') has reviewed your e-mails dated December 19, 2018 and December 27, 2018. Your e-mails indicates you represent IEEE. As customer and/or an organization, you or a representative of IEEE is eligible to petition to intervene in the rate case proceeding. Here is a link to the Public Service Commission's website where the instructions for a petition to intervene are provided: <https://psc.sc.gov/sites/default/files/Documents/Pro%20Se%20Litigant/Pro Se Litigant Guide Download.pdf>

The questions you have asked are legal discovery questions that are more appropriately directed to Duke Energy for a response. ORS is in the preliminary stages of its review of the Company's request.

Should you choose to intervene, you have the right to issue discovery directly to Duke Energy and receive a response from the Company.

Thank you for contacting the Office of Regulatory Staff.

Sincerely,

Brad Kirby



Investigator

bwkirby@regstaff.sc.gov

(800) 922-1531 ext. 75206 or

local (803) 737-5206

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From: Hasala Dharmawardena <hasala@ieee.org>

Sent: Thursday, December 27, 2018 1:17 AM

To: Kirby, Brad <bwkirby@regstaff.sc.gov>

Cc: Hauptmann, Susan <shauptm@regstaff.sc.gov>; Campbell, Chad <ccampbe@regstaff.sc.gov>; Johnson, Sarah <sjohnson@regstaff.sc.gov>; Dunbar, Skye <sdunbar@regstaff.sc.gov>; Waller, Takisha <twaller@regstaff.sc.gov>; Morgan, Willie <wmorgan@regstaff.sc.gov>

Subject: RE: Customer Comments - Duke Power Rate increase 2019

Dear Investigator,

The numbers correspond to the numbering of the Utility statement given [here](#).

The information you requested for is below.

1. Account holder name as it appears on your utility bill - HASALA DHARMAWARDENA
2. Account number
3. Account service address: 1450 CLEMSON RD APT 4, CLEMSON, SOUTH CAROLINA 29631-2611

Repeating the initial questions;

15.

- a. What is the cost associated with the new billing system? What are its new functionalities? Why does this need to be borne by the customers. Will this save money for the utility?
- b. How will the state of art technology impact the quality of the power delivered to customers? What are the expected changes in quantitative terms such as SAIFI and SAIDI.
- c. Why should the solar generation facilities be paid for by the customers? What is the basis for that decision? How will it affect service of Utility Energy?

16.

- a. Utility states that Gas fueled generation increased costs and that the reason was to have a cleaner, more reliable and smarter energy future. Was cost saving not a part of this decision? Should this not bring the costs down with the lower capital cost as well as O&M costs associated with gas fueled generation?

- b. Again why should the decision for Utility to invest in large scale solar projects be paid for by customers?
 - c. Did utility see the alternative options to relicensing the hydro-electric facilities? Will this cost not be offset by the minimum cost for hydro generation?
- 17.
- a. Why should customers pay for the Lee Nuclear facility investment when the decision was taken by Utility to build it in the first place and then to stop it. What percentage of the cost is borne by Utility?
- 19. Will this investment on smart systems help to decrease costs to Utility? How about the customers? Was the decrease in costs to Utility considered in the requested \$15 million?
 - 20. What costs would have occurred if there were no CCR compliance requirements?. How does the original compliance requirements differ from the new compliance requirements (CCR)?
 - 21. Why continue CCR even after compliance is met?
 - 22. What is meant by 'smarter grid'. If the grid is meant to be smarter should it not decrease costs rather than increase costs?
 - 38. What is meant by dynamic power flows? How much of customer owned technologies/generation is targeted in the Grid improvement plan? What is meant by 'system intelligence'?
 - 39. What are the improvements in SAIFI and SAIDI resulting from the Grid Improvement Plan? Why should you 'optimize voltage' when the requirement is to meet the grid code? What advantages to optimizing voltage?
 - 42. Why should all the customers bare the cost for transition to LED? Since I do not have any kind of lighting, why should I pay for subsidizing other customers to get LED outdoor lights?
 - 48. For any given technology, why was this not considered in the original decommissioning studies? How does the utility plan to ensure that this mistake is not repeated? Will this not make a change to the expected level playing field resulting in actually using more expensive generation rather than cheaper generation? Who should be responsible for the error?

New Questions (Numbering ABCD)

- A. How does Duke decide the optimum energy mix
- B. What are the long, medium, short term generation plans for South Carolina (if available)
- C. What is the basis for deciding these plans (planning criteria)
- D. Can a power Utility investment be conducted at a capital share basis between the utility and the customers?. For example an enhancement of the power system with utility finding 50% in capital and the remaining 50% passed over to the customers. The profits earned, in this case, should also be shared 50:50. For example, enhancement in distribution network decreasing maintenance, increasing energy transferred and decreasing power loss.
- E. What are the legislatures that govern the operation of the regulated power industry of South Carolina?
- F. Is there one document which states the energy policy of the state?
- G. What are the incentives that encourage the utility operate at increasing efficiency within the current regulatory framework?

Best,
Hasala Dharmawardena

From: Kirby, Brad <bwkirby@regstaff.sc.gov>

Sent: Thursday, December 20, 2018 12:33 PM

To: Hasala Dharmawardena <hasala@ieee.org>

Cc: Hauptmann, Susan <shauptm@regstaff.sc.gov>; Campbell, Chad <ccampbe@regstaff.sc.gov>; Johnson, Sarah <sjohnson@regstaff.sc.gov>; Dunbar, Skye <sdunbar@regstaff.sc.gov>; Waller, Takisha <twaller@regstaff.sc.gov>;

Morgan, Willie <wmorgan@regstaff.sc.gov>

Subject: RE: Customer Comments - Duke Power Rate increase 2019

Dear Mr. Hasala Dharmawardena:

This email is to advise you that the Office of Regulatory Staff ("ORS") has received the below attached email correspondence from the Public Service Commission ("PSC"). From the information contained in the below emails, it appears that you have filed a "Letter of Protest" with the PSC. It also appears that your "Letter of Protest" contained a number of question you desire to have answered.

Based on the below emails, it appears that portions of your correspondence(s) may not have been received by the ORS, as the questions start at number 15 and then skip numbers 23 to 37. In an effort to fully assist you, the ORS requests that you resubmit your "Letter of Protest" and/or (inquiry/compliant) to the ORS. Also, in order for the ORS to address this matter the ORS will need to obtain from you the following information:

1. Account holder name as it appears on your utility bill,
2. Account number,
3. Account service address.

If you have any questions please contact me at 803-737-5206.

Sincerely,

Brad Kirby



Investigator

bwkirby@regstaff.sc.gov

(800) 922-1531 ext. 75206 or

local (803) 737-5206

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From: Easterling, Deborah

Sent: Thursday, December 20, 2018 9:46 AM

To: Hasala Dharmawardena <hasala@ieee.org>

Cc: Hauptmann, Susan <shauptm@regstaff.sc.gov>; Kirby, Brad <bwkirby@regstaff.sc.gov>; Campbell, Chad <ccampbe@regstaff.sc.gov>; Johnson, Sarah <sjohnson@regstaff.sc.gov>; Dunbar, Skye <sdunbar@regstaff.sc.gov>; Waller, Takisha <twaller@regstaff.sc.gov>; Morgan, Willie <wmorgan@regstaff.sc.gov>

Subject: RE: Customer Comments - Duke Power Rate increase 2019

Hasala,

The Public Service cannot discuss a docket pending before the Commission. I am forwarding your email to the South Carolina Office of Regulatory Staff for response to your questions. In March 2004 the General Assembly enacted legislation which created the Office of Regulatory Staff. As a result of that legislation, effective January of 2005 the Public Service Commission took on an exclusively quasi-judicial role. All resources for the investigation and resolution of consumer inquiries and complaints were assigned to the Office of Regulatory Staff.

You may contact the South Carolina Office of Regulatory Staff by phone at 803-737-0800. You may also visit their website at <http://www.regulatorystaff.sc.gov>.

Please let me know if you should require any additional information.

Sincerely,

Deborah Easterling
Executive Assistant
Public Service Commission of South Carolina
803-896-5133

Sign up for Meeting Agenda Alerts: Text PSCAGENDAS to 39492

From: Easterling, Deborah
Sent: Thursday, December 20, 2018 9:27 AM
To: Hasala Dharmawardena <hasala@ieee.org>
Subject: RE: Customer Comments - Duke Power Rate increase 2019

Dear Hasala Dharmawardena,

This is to acknowledge receipt of your Letter of Protest/Comments to the Public Service Commission of South Carolina. Your Letter of Protest/Comments will be placed in the Protest File of the Docket listed below and on the Commission's Website at www.psc.sc.gov.

- Docket No. 2018-319-E - Application of Duke Energy Carolinas, LLC for Adjustments in Electric Rate Schedules and Tariffs and Request for an Accounting Order

A Protestant is an individual objecting on the ground of private or public interest to the approval of an Application, Petition, Motion or other matters which the Commission may have under consideration. A Protestant may offer sworn testimony but cannot cross-examine witnesses offered by other parties.

According to the Commission's Rules of Practice and Procedure, filing a Protest does not make you a Party of Record. A Protestant desiring to become an Intervenor (i.e., a Party of Record) in a proceeding before the Commission may file a Petition for Intervention within the time prescribed by the Commission.

You can follow this Docket and other daily filings made at the Commission by subscribing to the Commission's Email Subscriptions at this link: <https://dms.psc.sc.gov/Web/Email>; or you can follow the individual Docket at the link listed below:

Docket No. 2018-319-E - Application of Duke Energy Carolinas, LLC for Adjustments in Electric Rate Schedules and Tariffs and Request for an Accounting Order - <https://dms.psc.sc.gov/Web/Dockets/Detail/116872>

You can view Exhibits A thru E on our website – [Matter #279903](#).

If we may be of further assistance to you, please do not hesitate to contact us.

Sincerely,

Deborah Easterling

Executive Assistant
Public Service Commission of South Carolina
803-896-5133
Sign up for Meeting Agenda Alerts: Text PSCAGENDAS to 39492

From: Hasala Dharmawardena [<mailto:hasala@ieee.org>]
Sent: Wednesday, December 19, 2018 10:11 PM
To: PSC_Contact <Contact@psc.sc.gov>
Subject: RE: Customer Comments - Duke Power Rate increase 2019

Dear Commissioner,
In addition, the utility proposes to increase the Residential Basic Facilities Charge from \$8.29 to \$28.00 per month effective June 1, 2019.
This is a 337% increase. It will be also significantly impact the lower end users (who correlate with low income bracket) . The customer requests that the increase of the Residential Basic Facilities Charge by limited to a maximum of 10% year on year to ensure fairness for people with lower income.
Can you please send me Exhibits A to E since these were not available in the PSCSC website (docket number 2018-319-E.).

Regards,
Hasala

From: Hasala Dharmawardena <hasala@ieee.org>
Sent: Wednesday, December 19, 2018 9:45 PM
To: contact@psc.sc.gov
Subject: Customer Comments - Duke Power Rate increase 2019

Dear Commissioner,
Please find below my comments with respect to the request for comments published last month by the PSCSC. The Number is DOCKET NO. 2018-319-E . The comments are based on the information presented in <https://dms.psc.sc.gov/Attachments/Matter/aca5368d-4726-4db3-a64e-612ee1ccf997>.

15.

- a. What is the cost associated with the new billing system? What are its new functionalities? Why does this need to be borne by the customers. Will this save money for the utility?
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Best Regards,
Hasala Dharmawardena
Duke Energy Customer